

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Proceeding by the Department of Telecommunications and  
Energy on its own Motion to Develop Requirements for Mass  
Migrations of Telecommunications Service End-Users

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D.T.E. 02-28

**COMMENTS OF XO MASSACHUSETTS, INC.**

XO Massachusetts, Inc. (“XO”) submits these comments in response to the Department of Telecommunications and Energy (“Department”) *Legal Notice* issued June 10, 2002 on the Mass Migration Guidelines (“Guidelines”) developed by an industry collaborative.

XO participated in a series of meetings with Commission staff and other local carriers to develop the proposed Guidelines, and is pleased with the results of this collaborative effort. The Guidelines are a result of extensive weighing and balancing the needs of carriers, consumers and the Commission. Significant changes to the Guidelines may seriously upset the balanced treatment of all interests achieved in the Guidelines.

These Guidelines are based on the Mass Migration Guidelines (“NY Guidelines”) adopted by the New York Public Service Commission (“Commission”). The Commission recently reconvened the collaborative to revise and refine the NY Guidelines based on recent experiences. Once revised NY Guidelines are adopted, the Department may want to reconvene its collaborative to determine if any changes made to the NY Guidelines should be made in Massachusetts.

Accordingly, XO urges the Commission to adopt the proposed Mass Migration Guidelines, as presented in D.T.E. 02-28, in their entirety.

Respectfully submitted,

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Karen Nations  
XO Massachusetts, Inc.  
45 Eisenhower Drive, 5<sup>th</sup> Floor  
Paramus, NJ 07652  
(201) 226-3675